

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
NORTHERN DIVISION

AARON CLARK,)	
)	
Plaintiff,)	
)	
vs.)	Case No.: 2:10-CV-00066-AGF
)	
GEORGE LOMBARDI, DOUG PRUDDEN,)	
JILL PERKINS, R.N., DR. THOMAS)	
CABRERA, M.D., DR. ELIZABETH)	
CONLEY, MS. JEWEL COFIELD,)	
CORRECTIONAL MEDICAL SERVICES,)	
MS. BRENDA SHIRA, R.N., DR.)	
FARNHAM, M.D., S. KEETES, JOY)	
HAILEY, R.N., JEAN JOHNSON, VALITAS)	
HEALTH SERVICES, INC., CARMEN)	
VENTURA, JAY BARONE, H.S.A., DR.)	
STAN, and LINDA DILLON, R.N.,)	
)	
Defendants.)	

JOINT MOTION TO STAY DEADLINES UNDER THE
CASE MANAGEMENT ORDER

COMES NOW Plaintiff, by and through his undersigned counsel, Amy L. Ohnemus, and for the Joint Motion to Stay Deadlines Under the Case Management Order, state to the Court as follows:

1. On July 26, 2011, this Court entered its Initial Rule 16 Scheduling Order.
2. Pursuant to the Scheduling Order, the parties were to complete mediation by January 31, 2012. The Court upon the joint motion of all parties extended this deadline to March 1, 2012.

3. The Court upon the consent of all parties extended the deadline for mediation until April 16, 2012, modified the deadlines for defendants to request an IME of plaintiff, and for defendants to disclose and produce their expert witnesses.

4. Though the parties diligently worked to schedule the mediation, the parties were unable to find a date which worked for all counsel, the clients, the mediator, and with Northeast Correctional Center.

5. On March 29, 2012, Plaintiff's counsel filed a Motion to Modify the Case Management Order and requested new deadlines for the amendment of pleadings, for disclosure of expert witnesses for all parties, and for mediation and that Motion is still pending in front of this Court.

6. The parties agree that a stay of the deadlines under the current case management order is necessary pending the Court's determination on Plaintiff's Motion to Modify the Case Management Order. The parties agree that the Court's decision on Plaintiff's Motion to Modify the Case Management Order will affect the future progression of this matter.

WHEREFORE, counsel for Plaintiff requests that this Court stay the running of the deadlines under the current case management order until a determination is reached on Plaintiff's Motion to Modify the Case Management Order and for such other and further relief as the Court deems just and meet in the premises.

Respectfully submitted,

By s/Amy L. Ohnemus
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon the following counsel on this 16th day of April, 2012 via the Court's electronic notification system:

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